

Pearson, Evan

From: Civins, Jeff <Jeff.Civins@haynesboone.com>
Sent: Friday, May 17, 2013 2:30 PM
To: Bull, Jonathan
Cc: Barra, Michael; McKinney, Carie G.
Subject: RE: Clean Harbors Settlement Materials

Hi, Jon,

I misspoke today. I had understood that the largest RCRA penalty Region 6 had issued—at least in the past few years—was less than 7 figures, to US Ecology. Carie corrected me. The largest we identified was for Agrifos Fertilizer in 2011 -- \$1.8 million plus \$600,00 SEP; US Ecology's settlement was for \$788,120 in 2012. This clarification does not change my point regarding the appropriateness of the size of our proposed penalty.

haynesboone

Jeff Civins

Partner
jeff.civins@haynesboone.com

Haynes and Boone, LLP

600 Congress Avenue
Suite 1300
Austin, TX 78701-3285

(t) 512.867.8477
(f) 512.867.8691
(m) 512.750.1284

[vCard](#) | [Bio](#) | [Website](#)

CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by U.S. Treasury Regulations, Haynes and Boone, LLP informs you that any U.S. tax advice contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

CONFIDENTIALITY NOTICE: This electronic mail transmission is confidential, may be privileged and should be read or retained only by the intended recipient. If you have received this transmission in error, please immediately notify the sender and delete it from your system.